

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OHIO

IBRAHIM SHARQAWI,

Plaintiff,

v.

THE KIRBY COMPANY, ET AL.,

Defendants.

CASE NO. 1:20-CV-00271-BMB

JUDGE BRIDGET MEEHAN BRENNAN

DECLARATION OF ATTORNEY CARYN  
M. GROEDEL UNDER 28 U.S.C. §1746

I, Caryn M. Groedel, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, and can testify competently to such facts under oath.

2. I am President of Caryn Groedel & Associates Co., LPA.

3. I practiced law in Washington, D.C. from 1986 to approximately 1989, and in Maryland from 1989 to 1992.

4. In June 1992, I relocated to Cleveland, Ohio, and in 1993, began practicing law in Ohio as the Executive Director of the Women's Law Fund.

5. In approximately June of 1996, I opened my own firm.

6. I am a member in good standing of the State Bar of Ohio, the United States District Court for the Northern District of Ohio, and the Sixth Circuit Court of Appeals, and I am an Ohio certified specialist in labor and employment law.

5. Since my paralegal, Christina Carey, began working for my firm approximately ten years ago, I have done no calendaring of deposition dates, due dates, oral argument dates, or

1 otherwise. Calendaring has been almost exclusively by Ms. Carey, and occasionally by a law  
2 clerk or associate.

3 8. In this case, an e-mail of the Court's order regarding the oral argument on  
4 Defendants' Motion to Strike and Objection to Plaintiff's Opposition to Defendants' Motion for  
5 Summary Judgment and Motion for Leave to file an Opposition in Excess of L.R. 7.1's Page  
6 Limitation was received and was originally set by our office for October 13, 2022.  
7

8 9. I was contacted by defense counsel asking for the matter to be reset, to which I  
9 agreed, and the parties jointly filed that request at Doc. #72.

10 10. By Order dated 9/13/2022, this Court continued the matter to October 24, 2022. .

11 11. Since I was to be out of town on October 24, and since the oral argument had  
12 already been rescheduled once, I asked Co-counsel Patrick Perotti if he could appear, which he  
13 agreed to do.  
14

15 12. I overlooked the provision directing attendance of Lead Counsel and the parties.  
16 Following the rescheduling, the event was based on the entry of 9/13/2022, which did not have  
17 the additional language about Lead Counsel and parties.

18 12. I am aware that I have a responsibility to read Court orders, and recognize now  
19 that the 9/08/2022 Court Order in the last sentence directs the attendance of lead counsel and  
20 parties.  
21

22 13. I acknowledge that I overlooked that portion of the Order, but state that I did not  
23 do so out of contempt or disrespect for the Court.

24 14. I understand that my oversight affected the Court's schedule and the Defendants,  
25 and confirm that Mr. Perotti was correct in agreeing to pay sanctions accordingly.  
26  
27

Executed this 28<sup>th</sup> day of October, 2022. \_\_\_\_\_

Caryn M. Groedel  
CARYN M. GROEDEL